

EXHIBIT A
(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: Docket No. ____

**ORDER GRANTING MOTION BY PATRICK GRUHN, ROBIN MATZKE, AND
LOREM IPSUM UG TO LIMIT SERVICE OF MOTIONS TO DISMISS BANKRUPTCY
CASES OF (A) FTX TRADING LTD. AND (B) MACLAURIN INVESTMENTS LTD.**

Upon consideration of the motion (“**Motion**”)² of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG (collectively, “**LI Parties**”)) for entry of an order providing that notice of: (a) *Motion of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Dismiss Bankruptcy Case of Maclaurin Investments Ltd.* [D.I. 3399] (“**Maclaurin MTD**”) and (b) *Motion of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Dismiss Bankruptcy Case of FTX Trading Ltd.* [D.I. 3400] (with Maclaurin MTD, “**LI Parties’ MSTD**”) (i) may be limited and served on the court-approved shortened Rule 2002 of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”) established in the above-captioned jointly-administered chapter 11 cases and (ii) serving a notice of the LI Parties’ MSTD, substantially in the form annexed as **Exhibit 1** to this Order (“**Notice of MSTD**”), on all creditors, all as more fully set forth in the Motion; and this Court having

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in the above-captioned jointly-administered chapter 11 cases, a complete list of the debtors (collectively, “**Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but not defined in this Order shall have the meanings ascribed to them in the Motion.

jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012, and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the LI Parties' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and in accordance with the Bankruptcy Rules and Local Rules and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Notice of MSTD annexed as **Exhibit 1** hereto is approved.
3. The Court finds and holds that it was appropriate under the circumstances, to:
 - (a) serve the LI Parties' MSTD Dismiss by first class mail upon (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; and (g) those parties requesting notice pursuant to Bankruptcy Rule 2002, and (ii) serve a notice of the MSTD, substantially in the form of the Notice of MSTD, by first class mail on all creditors (or by email, if known). The foregoing service is hereby approved and the LT Parties may take all actions necessary to effectuate the relief granted in this Order

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Exhibit 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Objection Deadline: December 13, 2023 at 4:00 p.m. (ET)

Hearing Date: January 17, 2024 at 1:00 p.m. (ET)

**NOTICE OF MOTIONS TO DISMISS BANKRUPTCY CASES OF
(A) FTX TRADING LTD. AND (B) MACLAURIN INVESTMENTS LTD.**

PLEASE TAKE NOTICE that on October 27, 2023, Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG (together, “**LI Parties**”) filed (a) *Motion of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Dismiss Bankruptcy Case of Maclaurin Investments Ltd.* [D.I. 3399] (“**Maclaurin MTD**”) and (b) *Motion of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG to Dismiss Bankruptcy Case of FTX Trading Ltd.* [D.I. 3400] (with Maclaurin MTD, “**LI Parties’ MSTD**”).

PLEASE TAKE FURTHER NOTICE THAT objections, if any, to the relief requested in the LI Parties’ MSTD must be in writing and filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (“**Court**”), on or before **December 13, 2023, at 4:00 p.m. (ET)**. At the same time, you must also serve a copy of the objection so as to be received no later than **4:00 p.m. (ET) on December 13, 2023** on the following parties: (a) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, DE 19801, Attn: Laura Davis Jones (ljones@pszjlaw.com) and Peter J. Keane (pkeane@pszjlaw.com); (b) The Daley Law Firm, LLC, 4845 Pearl East Circle, Suite 101, Boulder, CO 80301 Darrell Daley (darrell@daleylawyers.com) and Samantha Neal (samantha@daleylawyers.com); and (c) Morrison Cohen LLP, 909 Third Avenue, 27th Floor, New York, NY 10022, Attn: Joseph T. Moldovan (jmoldovan@morrisoncohen.com) and Heath D. Rosenblat (hrosenblat@morrisoncohen.com).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in the above-captioned jointly-administered chapter 11 cases, a complete list of the debtors (collectively, “**Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

PLEASE TAKE FURTHER NOTICE THAT the hearing on the LI Parties' MSTD will be held on **January 17, 2024 at 1:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE THAT copies of the LI Parties' MSTD may be obtained free of charge from Kroll ("**Claims and Noticing Agent**") through the case website at <https://restructuring.ra.kroll.com/FTX/Home-Index> (or viewed on the internet, for a fee, at the Court's website <http://www.deb.uscourts.gov> by following the directions for accessing the ECF system on such website). Parties in interest may also request copies of the LI Parties' MSTD from the LI Parties by emailing the undersigned counsel. Please note that the Claims and Noticing Agent is not permitted to give legal advice.

Dated: _____, 2023
Wilmington, Delaware

/s/

Laura Davis Jones (DE Bar No. 2436)
Peter J. Keane (DE Bar No. 5503)
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- and -

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Joseph T. Moldovan (admitted *pro hac vice*)
Heath D. Rosenblat (admitted *pro hac vice*)
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*Counsel to Patrick Gruhn, Robin Matzke,
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